

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

**ERIC O'KEEFE and WISCONSIN
CLUB FOR GROWTH, INC.,**

Plaintiffs,

v.

Civil Case No. 14-cv-00139

**FRANCIS SCHMITZ, in his official and
personal capacities,
JOHN CHISHOLM, in his official and
personal capacities,
BRUCE LANDGRAF, in his official and
personal capacities,
DEAN NICKEL, in his official and
personal capacities, and
GREGORY PETERSON, in his official
capacity,**

Defendants.

**MOTION TO INTERVENE AND UNSEAL OF THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS, AMERICAN SOCIETY OF NEWS EDITORS,
WISCONSIN BROADCASTERS ASSOCIATION, WISCONSIN FREEDOM OF
INFORMATION COUNCIL, AND WISCONSIN NEWSPAPER ASSOCIATION**

The Reporters Committee for Freedom of the Press, American Society of News Editors, Wisconsin Broadcasters Association, Wisconsin Freedom of Information Council, and Wisconsin Newspaper Association (collectively, the “Coalition”), by and through their counsel, respectfully move this Court for an order (1) permitting them to intervene in this matter for the limited purpose of challenging the sealing orders entered by the Court, *see* Fed. R. Civ. Proc. 24(b); *Jessup v. Luther*, 227 F.3d 993, 996–99 (7th Cir. 2000), and (2) unsealing documents that the Court has permitted the parties to file under seal. In support of this Motion, the Coalition asserts its rights of access under the common law and the First Amendment to the United States

Constitution to civil proceedings pending before this Court and to this Court's documents and records.

This Motion is based upon the Memorandum of Points and Authorities filed concurrently herewith, the pleadings and other documents on file in this matter, and any argument of counsel the Court shall wish to entertain.

Dated: May 1, 2014

Respectfully submitted,

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* Admission to the Eastern District of Wisconsin pending